REMARKS

This is a full and timely response to the outstanding final Office Action mailed April 6, 2006. Reconsideration and allowance of the application and pending claims are respectfully requested.

Claim Rejections - 35 U.S.C. § 102(e)

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e).

In the present case, not every feature of the claimed invention is represented in the applied references. Applicant discusses the references and Applicant's claims in the following.

A.   Rejections Under Mazzagatte

Claims 1-9, 24-26, 54-62, 71, 72, and 93-96 have been rejected under 35 U.S.C. § 102(e) as being anticipated by *Mazzagatte, et al.* (U.S. Pat. No. 6,862,583). Applicant respectfully traverses this rejection.

Mazzagatte describes a system and method for authenticated secure printing. *Mazzagatte*, Patent Title. In Mazzagatte's method, a sender submits a print job along with a unique identification information that *identifies the person who is the intended recipient* of the job. *Mazzagatte*, column 8, lines 19-22. The print job is then received by

a "print node," which can comprise a printer or a gateway (e.g., server) to one or more printers. *Mazzagatte*, column 7, lines 39-41; column 8, lines 62-63. Upon receiving the data, the print node processes the print data (e.g., encrypts the print data) and waits for the intended recipient to arrive at the printer and present proper authentication information in order to retrieve the print job and have it printed. *Mazzagatte*, column 9, lines 8-10; lines 32-35.

In view of the above method, it is clear that Mazzagatte does not teach each and every limitation of Applicant's claims. Beginning with independent claim 1, as a first matter, Mazzagatte does not teach "recording a reference to the On-the-Go Print Queue on a portable computing device" such as a smart card. Instead, Mazzagatte only describes "unique identification information of the intended recipient" being stored on the smart card that is used to authenticate the person presenting the smart card as being the "intended recipient." *See Mazzagatte*, column 8, lines 14-16. Nowhere does Mazzagatte state that the a "reference" to any "print queue" is recorded or resident on Mazzagatte's smart card.

As a second matter, Mazzagatte does not teach connecting a portable computing device, such as a smart card, to a printer that is "programmed to read references" from the device. The "reference" being referred to in the claim is a reference to the print queue (the "On-the-Go Print Queue"). Instead, Mazzagatte's printer is only described as being programmed to read "unique identification information of the intended recipient" from a smart card. *Mazzagatte*, column 8, lines 14-20.

Third, Mazzagatte does not teach "reading with the printer the reference to the On-the-Go Print Queue from the portable computing device". Again, Mazzagatte's

printer is only described as reading "unique identification information of the intended recipient" from a smart card to authenticate the person presenting the smart card as being the "intended recipient." *Mazzagatte*, column 8, lines 14-20.

Applicant notes that it is unclear how Mazzagatte's printer knows where the "print node" is because Mazzagatte leaves that detail out of his disclosure. Perhaps the user manually identifies the location of the print node to the printer using a front panel of the printer. Regardless, however, the fact remains that Mazzagatte fails to describe storing a reference to a print queue on Mazzagatte's smart card or reading that reference from the smart card. It therefore follows that Mazzagatte cannot be said to anticipate each and every limitation of claim 1. For at least that reason, claim 1 and its dependents are allowable over the Mazzagatte reference.

Turning to independent claim 54, Mazzagatte does not teach a program product comprising code for "recording a reference to the On-the-Go Print Queue on a portable computing device" or "reading with a printer the reference to the On-the-Go Print Queue from the portable computing device" at least for reasons described above in relation to claim 1. Again, Mazzagatte's printer only reads "unique identification information of the intended recipient" from a smart card to authenticate the person presenting the smart card as being the "intended recipient." *Mazzagatte*, column 8, lines 14-20. Mazzagatte is silent as to how the printer knows where the "print node" that stores the print data is. For at least that reason, claim 54 and its dependents are allowable over the Mazzagatte reference.

Finally, referring to independent claim 93, Mazzagatte does not teach a printer comprising structure for reading a smart card and "obtaining from the smart card a

reference to an On-the-Go print queue on the Internet". Again, Mazzagatte's printer only reads "unique identification information of the intended recipient" from a smart card to authenticate the person presenting the smart card as being the "intended recipient." *Mazzagatte*, column 8, lines 14-20. Mazzagatte is silent as to how the printer knows where the "print node" that stores the print data is. For at least that reason, claim 93 and its dependents are allowable over the Mazzagatte reference.

B.   Rejections Under Matsubayashi

Claims 1-4, 8, 9, 16, 17, 19-26, 54-57, 61, 62, 67, 68, 71, 72, 93, 97, and 98 have been rejected under 35 U.S.C. § 102(e) as being anticipated by *Matsubayashi, et al.* (U.S. Pub. No. 2003/10093670). Applicant respectfully traverses this rejection.

Matsubayashi describes a system and method for authenticated secure printing that is very similar to that described in the Mazzagatte reference described above. This may be because Mazzagatte is listed as an inventor for the Matsubayashi reference. In view of the similarities between the references, a detailed discussion of the system and method described in the Matsubayashi reference will not be provided and reference is made back to the description of the system and method of the Mazzagatte reference.

Beginning with claim 1, Matsubayashi does not teach "recording a reference to the On-the-Go Print Queue on a portable computing device", connecting a portable computing device, such as a smart card, to a printer that is "programmed to read references" from the device", or "reading with the printer the reference to the On-the-Go Print Queue from the portable computing device". Similar to the method described in the Mazzagatte reference, the method described in the Matsubayashi reference comprises

-14-

storing "unique identification information" on a smart card and reading the "unique identification information" of the intended recipient from the smart card with a printer to authenticate the person presenting the smart card as being the "intended recipient." *See Matsubayashi*, paragraph 106. For at least that reason, claim 1 and its dependents are allowable over the Matsubayashi reference.
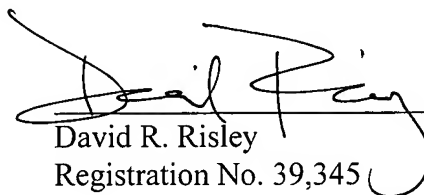
Turning to independent claim 54, Matsubayashi does not teach a program product comprising code for "recording a reference to the On-the-Go Print Queue on a portable computing device" or "reading with a printer the reference to the On-the-Go Print Queue from the portable computing device" at least for reasons described above in relation to claim 1. Again, Matsubayashi's printer only reads "unique identification information" from a smart card to authenticate the person presenting the smart card as being the "intended recipient." *Matsubayashi*, paragraph 106. Matsubayashi, like Mazzagatte, is silent as to how the printer knows where the "print node" that stores the print data is. For at least that reason, claim 54 and its dependents are allowable over the Matsubayashi reference.

Finally, referring to independent claim 93, Matsubayashi does not teach a printer comprising structure for reading a smart card and "obtaining from the smart card a reference to an On-the-Go print queue on the Internet". Again, Matsubayashi's printer only reads "unique identification information" from a smart card to authenticate the person presenting the smart card as being the "intended recipient. *Matsubayashi*, paragraph 106. Matsubayashi is silent as to how the printer knows where the "print node" that stores the print data is. For at least that reason, claim 93 and its dependents are allowable over the Matsubayashi reference.

CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

David R. Risley
Registration No. 39,345

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Assistant Commissioner for Patents, Alexandria, Virginia 22313-1450, on

5-23-06

Signature

-16-